

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-v-

24-MC-6021

\$330,000.00 UNITED STATES CURRENCY,

Defendant *in rem*.

**STIPULATION TO EXTEND PLAINTIFF'S TIME
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

The United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Mary Clare Kane, Assistant United States Attorney, of counsel, Justin D. Ginter, Esq., attorney for Mizra Khan, and Robert C. Singer, Esq., attorney for Talib Hussein, hereby stipulate and agree to waive any time restrictions or requirements, and to extend the government's time period to commence a judicial forfeiture action of the above-captioned seized property to 30 days after the entry of the final disposition of the criminal case, including any subsequent appeals, by criminal judgment, mandate, or other termination of proceedings in any related criminal action initiated by a criminal complaint.

The parties to this Stipulation further agree that Mizra Khan and Talib Hussein may revoke their consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the above-named property, and in that event, the government shall then have twenty-one (21) days from the date the government received

notice of such action to file its Verified Complaint for Forfeiture.

TRINI E. ROSS
United States Attorney
Western District of New York

Dated: December 17, 2024

BY: Mary Clare Kane
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Dated: December 17, 2024

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Dated: December 17, 2024

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